

Served: March 18, 2003



**UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C.**

Issued by the Department of Transportation  
on the 18<sup>th</sup> day of March, 2003

Application of

**WESTWARD AIRWAYS, INC.**

**Docket OST-02-14071**

for a certificate of public convenience and necessity under  
49 U.S.C. 41102 to engage in interstate scheduled air  
transportation of persons, property, and mail

**ORDER TO SHOW CAUSE  
PROPOSING ISSUANCE OF CERTIFICATE AUTHORITY**

**Summary**

By this order, we tentatively find that Westward Airways, Inc., (Westward) is fit, willing, and able to provide interstate scheduled air transportation of persons, property, and mail as a certificated air carrier, subject to certain limitations.<sup>1</sup>

**Background**

Section 41102 of Title 49 of the United States Code (the Transportation Code) directs us to determine whether applicants for certificate authority to provide interstate and foreign scheduled air transportation of persons, property and mail are “fit, willing, and able” to perform such transportation and to comply with the Transportation Code and the regulations of the Department. In making fitness findings, the Department uses a three-part test that reconciles the Airline Deregulation Act's liberal entry policy with Congress' concern for operational safety and consumer protection. The three areas of inquiry that must be addressed in order to determine a company's fitness are whether the applicant (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) will have access to resources sufficient to commence operations without posing an undue risk to consumers, and (3) will comply with the Transportation Code and regulations imposed by Federal and State agencies. We must also find that the applicant is a U.S. citizen.

On December 13, 2002, Westward filed an application in Docket OST-02-14071 for a certificate to engage in interstate scheduled air transportation of persons, property, and mail. The carrier accompanied its application with the fitness information required by section 204.3 of our regulations.

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<sup>1</sup> Specifically, we propose to limit Westward's authority to the operation of aircraft with up to 9 passenger seats.

No answers opposing Westward's application were filed and no special issues regarding the applicant have come to our attention. Under these circumstances, we propose to decide the issue of the applicant's fitness on the basis of the written record, and tentatively conclude that Westward is a U.S. citizen and is fit, willing, and able to operate its proposed interstate scheduled passenger service. However, we will give interested persons an opportunity to show cause why we should not adopt as final the tentative findings and conclusions stated herein.

## **FITNESS**

### **The Company**

Westward was incorporated in the State of Nebraska in January 1998 to conduct intrastate air passenger operations using small aircraft from its operating base in Scottsbluff, Nebraska. To date, the applicant's activities have been limited to efforts to fund its operation, and to developing plans for aircraft leasing, maintenance support, facilities leasing, and other pre-operational matters and activities.

The carrier's voting stock is owned by Ms. Kristi Feusner, the carrier's President and Board Chairman (36.3 percent), Mr. John J. Warden, Westward's Executive Vice-President of Operations (36.3 percent), and a number of other shareholders including Mr. Craig L. Carlson, who serves as the third member of Westward's Board of Directors.<sup>2</sup> Both Ms. Feusner and Mr. Warden are U.S. citizens. As part of its capital program, Westward plans to offer additional voting stock to the public, although the applicant expects that none of the new shareholders will individually own as much as ten percent of the company's voting stock following this offering.

If found fit, Westward proposes to begin its operations during the first half of 2003 using a leased Pilatus PC-12/45 aircraft accomodating up to 9 passenger seats. The carrier will operate over a route with service to Omaha, North Platte, Lincoln and Scottsbluff, Nebraska. Approximately 6 months later, Westward plans to lease a second PC-12/45 aircraft and expand its operations to Rapid City, Pierre and Sioux Falls, South Dakota.

### **Managerial Competence**

Ms. Kristi Feusner, a 1991 graduate of Embry-Riddle Aeronautical University, is Westward's President and Chairman of the Board. She began her professional aviation career in 1992 as Airport Manager of the Hall County Airport Authority in Grand Island, Nebraska. Later that year, and until August 1995, she served as Assistant Airport Manager of the Cheyenne Airport Board. In both of these positions Ms. Feusner dealt with FAA compliance and regulatory issues, fiscal control matters, and human resource management responsibilities. A certified private pilot, Ms. Feusner also founded the Southeast Wyoming Pilot's Association, a public advocacy group for general aviation enthusiasts. After a break of two and a half years from the aviation field during which she held the position of Safety Officer with Frontier Oil Company (November 1995-May 1996) and Computer Operator and programmer

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<sup>2</sup> Mr. Carlson, a U.S. citizen, holds 3.9 percent of Westward's stock. The applicant has stated that none of its other stockholders own or control more than ten percent of its issued and outstanding stock.

at Safecard Services, Inc. (August 1996-February 1998), Ms. Feusner was selected as Westward's President on January 26, 1998. As both President and Chairman of Westward's Board, Ms. Feusner's efforts have focused primarily on strategic planning and policy formulation as the company seeks to become operational.

Mr. John J. Warden is Westward's Executive Vice President of Operations. Although he has had no previous airline work experience, he holds a Commercial Pilot Certificate and a bachelor's degree in Aviation Science awarded in 1996. Since assuming his present position with Westward in January 1998, he has worked with its President to promote and develop the company. Mr. Warden's work experience prior to joining Westward was principally in the motor carrier business.<sup>3</sup>

Mr. Robert A. Armstrong is Westward's Director of Flight Operations. He is a certified Flight Instructor and holds a Commercial Pilot Certificate. After serving as a flight instructor between 1991 and 1992, Mr. Armstrong was employed as a pilot by a number of air carriers including America Air Network, Lynch Flying Service, Alpine Air, Air Cargo Masters, Great Lakes Aviation, Ltd., and Exec Air. Between January 1996 and June 1998, he served as Chief Pilot for 3-D Aviation in Helena, Montana. In February 2001, Mr. Armstrong was hired as a full-time pilot with Corporate Air in Billings, Montana. Presently, he devotes approximately 95 percent of his work time to his duties at Corporate Air, with the remaining five percent of his time spent working for the applicant. However, he intends to become a full-time employee of Westward upon commencement of its scheduled passenger operations.

Mr. James W. Lohman, an Airframe and Powerplant Mechanic, is Westward's Director of Maintenance Operations. Since receiving his degree in Aircraft Maintenance Technology in May 1985, Mr. Lohman has served as an aircraft mechanic for a number of air carriers including Southwest Nebraska Aviation, Midway Airlines, and GP Express Airlines where he also served for six years as Chief Inspector. For three years beginning in 1996, Mr. Lohman was owner/operator of T&J Aircraft, an aircraft maintenance service in Broken Bow, Nebraska. Between 1999 and 2000, he worked, respectively, as Vice President of Maintenance and Director of Maintenance for Yute Air Alaska and Alaska Central Express. Between 2000 and 2001 he worked for Merlin Airways, advancing to Director of Maintenance. Finally, in September, 2002, Mr. Lohman returned to T&J Aircraft. Like Mr. Armstrong, he will become a full-time employee of Westward when the applicant commences operations.

Mr. Darrel L. Munson, an Airline Transport Pilot, serves as Westward's Chief Pilot. He began his aviation career in 1975 as a charter pilot and flight instructor for Trego Aviation, leaving that company in December 1985. Since that time, he has been employed as a pilot for a variety of air carriers, including GP Express Airlines, Maverick Airways, CargoMasters, Great Lakes Aviation, and Baron Aviation Services, where he is currently employed. Mr. Munson presently spends approximately five percent of his time working on Westward business, but will become a full-time employee once the company commences operations.

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<sup>3</sup> Prior to his employment with Westward, Mr. Warden worked as a warehouse manager for Permer Enterprises and as a dock worker and shift supervisor for Viking Freight, Inc.

After reviewing the experience and background of the applicant's key personnel, and discussing various aspects of their qualifications with the FAA staff responsible for certificating and overseeing the carrier's operations, we tentatively conclude that Westward has demonstrated that it has the management skills and technical ability to conduct its limited proposed service.<sup>4</sup>

## **Financial Plan and Operating Proposal**

If granted the certificate authority it seeks, Westward proposes to provide interstate scheduled air transportation in the upper Midwest and northern Rocky Mountain regions of the United States. Initially, Westward intends to commence operations over a Scottsbluff–North Platte–Lincoln–Omaha routing using a leased 9-seat Pilatus PC-12/45. Westward proposes to operate two round-trip flights Mondays through Fridays over this routing with a reduced level of service on weekends. Approximately six months following commencement of the Scottsbluff–Omaha service, Westward plans to initiate operations to Rapid City, Pierre and Sioux Falls, South Dakota, using a second leased PC-12/45 aircraft.

Westward projects that it will incur \$851,672 in pre-operating expenses and that its first year operating expenses will total approximately \$2.4 million. We have reviewed the applicant's projected expenses and find them to be reasonable. Therefore, based on the information before us, Westward will need approximately \$1.5 million in funds to meet our financial fitness criteria.<sup>5</sup>

Westward's income statement for the period August 1999-September 2002 shows a cumulative net loss of \$225,761, reflecting the fact that the carrier has yet to begin operations. Westward's balance sheet, dated September 30, 2002, shows total current assets of \$19,334 and total current liabilities of \$756, resulting in a positive working capital position of \$18,578. This balance sheet also shows total assets of \$192,892 and total equity of \$92,136.

At present, Westward is actively engaged in raising the funding required to commence operations. The majority of Westward's required funding will be provided by a \$950,000 line-of-credit to be issued to Westward by the Platte Valley National Bank. This line-of-credit will be secured by a grant from the Department awarded under the Small Community Air Service Development Pilot Program. The grant was awarded to Scottsbluff County and the applicant, acting as a public-private partnership, and became effective on September 16 with the execution of a Grant Assurance Contract between Scottsbluff and the Department

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<sup>4</sup> Before authorizing a carrier to conduct air transportation operations, the FAA also evaluates certain of the applicant's key personnel with respect to the minimum qualifications for those positions as prescribed in the Federal Aviation Regulations. The FAA's evaluation of these key personnel provides an added practical and in-person test of the skills and technical ability of these individuals. The FAA has advised us that all of the individuals holding key technical positions with Westward are qualified and have been approved for those positions.

<sup>5</sup> To meet the Department's financial fitness criteria, an applicant should have access to financial resources sufficient to cover all of its pre-operating expenses and the expenses that are reasonably projected to be incurred during three months of "normal" operations. Because projected expenses during the first several months of air transportation services frequently do not include all costs that will be incurred during a "normal" period of operations, it is our practice to base our three-month test on one-quarter of the first year's operating cost forecast, which, in this case, is \$607,124. Further, in calculating available resources, projected revenues may not be used.

(see Order 2002-6-14). Westward proposes to obtain the remainder of its required funds from a private placement of stock, which, if successful, will provide the company with \$550,000–600,000. This stock placement is currently on-going.<sup>6</sup>

Should Westward successfully complete its on-going funding efforts, the applicant will have available to it the \$1.5 million in funds required to meet the Department's financial fitness test. However, since these funds are not currently in the company's possession, as is our practice, we will require that Westward provide independent third-party verification that it has on-hand or available to it through loans and/or lines-of-credit the necessary funding to meet our financial fitness requirements prior to our issuing it effective certificate authority.

In light of the above, we tentatively conclude that Westward has demonstrated that, if its funding efforts are completed successfully, it will have sufficient financial resources to enable it to commence its proposed scheduled passenger operations without posing an undue risk to consumers or their funds.

### **Compliance Disposition**

We also tentatively conclude that Westward has the proper regard for the laws and regulations governing its services to ensure that its aircraft and operations conform to applicable safety standards and that acceptable consumer relations practices will be followed.

Westward has stated that there are no actions or outstanding judgments against it, its owners, or its key personnel, nor have there been any charges of unfair, deceptive or anti-competitive business practices, or of fraud, felony or antitrust violations brought against any of these parties in the past ten years. Moreover, our search of the Department's records found no compliance problems involving Westward, its owners, or its key personnel. The applicant also states that there are no pending investigations, enforcement actions, or formal complaints filed by the Department against it, its key personnel, or persons having a substantial interest in it with respect to compliance with the Transportation Code or the Department's regulations.

Finally, the FAA has advised us that it knows of no reason why Westward should not be granted the authority it is seeking.

### **CITIZENSHIP**

Section 41102 of the Transportation Code requires that certificates to engage in air transportation be held only by citizens of the United States as defined in 49 U.S.C. 40102(a)(15). That section requires that the President and two-thirds of the Board of Directors and other managing officers be U.S. citizens and that at least 75 percent of the outstanding voting stock be owned by U.S. citizens. We have also interpreted the Transportation Code to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

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<sup>6</sup> Through private placement, Westward previously raised \$210,000. These funds, as well as an additional \$250,000 in capital obtained from other sources, have been used to fund the company's organizational expenses thus far.

As stated earlier, Ms. Kristi Feusner and Mr. John Warden, both U.S. citizens, own a total of 72.6 percent of Westward's stock. The remainder of Westward's stock is also held by U.S. citizens. In addition, all of Westward's key personnel are U.S. citizens and the company has provided an affidavit attesting that it is a citizen of the United States within the meaning of the Transportation Code. Finally, our review of the applicant's citizenship has uncovered no reason to suggest that control of Westward rests with non-U.S. citizens.

Based on the above, we tentatively conclude that Westward is a citizen of the United States and is fit, willing, and able to conduct the interstate scheduled passenger operations proposed in its application.

## **OBJECTIONS**

We will give interested persons 14 days following the service date of this order to show cause why the tentative findings and conclusions set forth here should not be made final; answers to objections will be due within 7 days thereafter. We expect such persons to direct their objections, if any, to the application and points at issue and to support such objections with detailed economic analyses. If an oral evidentiary hearing or discovery procedures are requested, the objector should state in detail why such a hearing or discovery is considered necessary, and what material issues of decisional fact the objector would expect to establish through a hearing or discovery that cannot be established in written pleadings. The objector should consider whether discovery procedures alone would be sufficient to resolve material issues of decisional fact. If so, the type of procedure should be specified (*See* Part 302, Rules 19 and 20); if not, the reasons why not should be explained. We will not entertain general, vague, or unsupported objections. If no substantive objections are filed, we will issue an order that will make final our tentative findings and conclusions with respect to Westward's fitness and certification.

## **CERTIFICATE CONDITIONS AND LIMITATIONS**

If Westward is found fit and issued the certificate it seeks, its authority will not become effective until the company has fulfilled all of the requirements for effectiveness as set forth in the terms and conditions attached to its certificate. Among other things, this includes our receipt of evidence that Westward has been certified by the FAA to engage in the subject operations, a fully executed OST Form 6410 evidencing liability insurance coverage that meets the requirements of section 205.5(b) of our rules, and independent third-party verification that Westward has available to it funds sufficient to meet our financial fitness criteria.<sup>7</sup>

We also wish to remind the company of the requirements of 49 U.S.C. 41110(e). Specifically, that section requires that, once a carrier is found fit initially, it must remain fit in order to hold its authority. To be assured that certificated air carriers continue to be fit after effective authority has been issued to them, we require that they supply information describing any subsequent substantial changes they may undergo in areas affecting fitness.

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<sup>7</sup> Westward submitted its Aviation Accident Family Assistance Plan with the Department (in Docket OST-96-1960) and with the National Transportation Safety Board on December 13, 2002.

Our tentative findings stated above are based on the operating plan described in Westward's application, namely, utilizing 9-seat aircraft under Part 135 of the Federal Aviation Regulations. Were the applicant to propose to expand its scheduled operations to include aircraft for which a Part 121 certificate was required (*i.e.*, aircraft having 10 passenger seats or more), our fitness findings might no longer apply. Therefore, we propose to limit any authority issued to Westward to operations with aircraft having no more than 9 passenger seats. Should Westward subsequently desire to acquire and operate larger aircraft, it must first be determined fit for such operations.

In addition, should Westward propose other substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules.<sup>8</sup> The compliance of the company with this requirement is essential if we are to carry out our responsibilities under section 41110 (e).<sup>9</sup>

Finally, to aid the Department in monitoring the fitness of new carriers, we are requiring that all newly certificated carriers submit a detailed progress report, within 45 days following the end of the first year of certificated operations, to the Air Carrier Fitness Division. The report should include a description of the carrier's current operations (number and type of aircraft, principal markets served, total number of full-time and part-time employees), a summary of how these operations have changed during the year, a discussion of any changes it anticipates from its current operations during its second year, current financial statements,<sup>10</sup> and a listing of current senior management and key technical personnel. The carrier should also be prepared to meet with staff members of the Fitness Division to discuss its current and future operations.

#### **ACCORDINGLY:**

1. We direct all interested persons to show cause why we should not issue an order making final the tentative findings and conclusions stated above and award a certificate to Westward Airways, Inc., authorizing it to engage in interstate scheduled air transportation of persons, property, and mail, subject to the attached specimen Terms, Conditions, and Limitations.

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<sup>8</sup> The carrier may contact our Air Carrier Fitness Division to report proposed substantial changes in its operations, ownership, or management, and to determine what additional information, if any, will be required under section 204.5. In addition, by notice dated July 21, 1998, the Department requested air carriers to provide a 30-day advance notification of any proposed change in ownership, restructuring, or recapitalization. If the carrier fails to file this updated information or if the information fails to demonstrate that the carrier will continue to be fit upon implementation of the substantial change, the Department may take such action as is appropriate, including enforcement action or steps to modify, suspend, or revoke the carrier's certificate authority.

<sup>9</sup> We also remind Westward about the requirements of section 204.7 of our rules. This section provides, among other things, that (1) the certificate authority granted to a company shall be revoked if the company does not commence actual flying operations under that authority within one year of the date of the Department's determination of its fitness; (2) if the company commences operations for which it was found fit and subsequently ceases such operations, it may not resume certificated operations unless its fitness has been redetermined; and (3) if the company does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

<sup>10</sup> These financial statements should include a balance sheet as of the end of the company's first full year of actual flight operations and a twelve-month income statement ending that same date.

2. We direct any interested persons having objections to the issuance of an order making final any of the proposed findings, conclusions, or the certificate award set forth here to file them with Department of Transportation Dockets, 400 Seventh Street, SW, PL-401, Washington, D.C. 20590, in Docket OST-02-14071, and serve them upon all persons listed in Attachment A no later than 14 days after the service date of this order. Answers to objections shall be filed no later than 7 days thereafter.
3. If timely and properly supported objections are filed, we will accord full consideration to the matters or issues raised by the objections before we take further action.<sup>11</sup>
4. In the event that no objections are filed, we will consider all further procedural steps to be waived and we will enter an order making final our tentative findings and conclusions.
5. We will serve a copy of this order on the persons listed in Attachment A.
6. We will publish a summary of this order in the Federal Register.

By:

**READ C. VAN DE WATER**  
Assistant Secretary for Aviation  
and International Affairs

**(SEAL)**

*An electronic version of this document is available on the World Wide Web at:*  
<http://dms.dot.gov>

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<sup>11</sup> Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.





## SPECIMEN

Terms, Conditions, and Limitations

### WESTWARD AIRWAYS, INC.

is authorized to engage in interstate air transportation of persons, property, and mail between any point in any State, territory, or possession of the United States or the District of Columbia, and any other point in any of those entities.

This authority is subject to the following provisions:

(1) The authority to operate under this certificate will not become effective until six (business) days after the Department has received the following documents; provided, however, that the Department may stay the effectiveness of this authority at any time prior to that date:

(a) A copy of the holder's Air Carrier Certificate and Operations Specifications authorizing such operations from the Federal Aviation Administration (FAA) .

(b) A certificate of insurance on OST Form 6410 evidencing liability insurance coverage meeting the requirements of 14 CFR 205.5(b) for all of its aircraft.

(c) A statement of any changes the holder has undergone in its ownership, key personnel, operating plans, financial posture, or compliance history, since the date of the Show Cause Order in this case.

(d) A revised list of pre-operating expenses already paid and those remaining to be paid, as well as independent verification that the holder has available to it funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.

(2) Pending receipt of effective authority, the holder may not accept payment of any kind (i.e., cash, check, or credit card) or issue tickets for the operations proposed under this certificate, and any advertisement or listing of flights by the holder must prominently state: "This service is subject to receipt of government operating authority."

(3) The holder's authority is limited to operations conducted with aircraft having 9 passenger seats or less. In the event that the holder wishes to initiate operations with aircraft having 10 or more passenger seats, it must first be determined fit for such operations.

(4) The holder shall at all times conduct its operations in accordance with the regulations prescribed by the Department of Transportation for the services authorized by this certificate, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.

(5) The holder's authority is effective only to the extent that such operations are also authorized by the FAA, and comply with all Department of Transportation and Department of Homeland Security requirements concerning security.

(6) The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. 40102(a)(15).

(7) The holder shall maintain in effect liability insurance coverage as required under 14 CFR Part 205. Failure to maintain such insurance coverage will render a certificate ineffective, and this or other failure to comply with the provisions of Subtitle VII of Title 49 of the United States Code or the Department's regulations shall be sufficient grounds to revoke this certificate.

(8) The holder is authorized to conduct charter flights in interstate and/or foreign air transportation in accordance with the provisions of 14 CFR 212.

(9) In the event that the holder receives effective scheduled passenger authority, the following additional conditions will apply:

(a) The holder may reduce or terminate service at any point or between any two points, subject to compliance with the provisions of 49 U.S.C. 41734 and all orders and regulations issued by the Department of Transportation under that section.

(b) The holder may not provide scheduled passenger air transportation to or from Dallas (Love Field), Texas, except within the limits set forth in section 29 of the International Air Transportation Competition Act of 1979, as amended by section 337 of the Department of Transportation and Related Agencies Appropriations Act, 1998.

(10) Should the holder propose any substantial changes in its ownership, management, or operations (as that term is defined in 14 CFR 204.2(1)), it must first comply with the requirements of 14 CFR 204.5.

(11) In the event that the holder does not commence actual flying operations under this certificate within one year of the date of the Department's determination of its fitness, its authority shall be revoked for dormancy, unless the holder is conducting operations under another type of certificate authority. Further, in the event that the holder commences operations for which it was found "fit, willing, and able" and subsequently ceases all such operations, its authority under all certificates held shall be suspended under the terms of 14 CFR 204.7 and the holder may neither recommence nor advertise such operations unless its fitness to do so has been redetermined by the Department. Moreover, if the holder does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

ATTACHMENT A

**SERVICE LIST FOR WESTWARD AIRWAYS, INC.**

MS KRISTI A FEUSNER  
PRESIDENT & CHAIRMAN  
WESTWARD AIRWAYS INC  
250027 AIRPORT TERM ST  
SCOTTSBLUFF NE 69361

MS JONI MOUNT  
PRODUCT MANAGER  
TRANSPORT PRINT PRODUCTS  
OFFICIAL AIRLINE GUIDE  
2000 CLEARWATER DRIVE  
OAK BROOK IL 60521

MR ALLEN MUTEN  
ASSISTANT TREASURER  
AIRLINES REPORTING CORP  
1530 WILSON BLVD STE 800  
ARLINGTON VA 22209-2448

MR STEVEN M KUPKA  
COUNSEL FOR WESTWARD  
AIRWAYS INC  
BLACKWELL SANDERS  
PEPER MARTIN LLP  
1737 H STREET NW  
WASHINGTON DC 20006

REGIONAL COUNSEL  
FAA ACE-7  
CENTRAL REGION HDQ  
901 LOCUST  
KANSAS CITY MO 64106-2641

MR DON BRIGHT K-14  
OFFICE OF AIRLINE INFO  
DEPT OF TRANSPORTATION  
400 7TH STREET SW  
WASHINGTON DC 20590

MR HAROLD J DAUB  
BLACKWELL SANDERS  
PEPER MARTIN LLP  
13710 FNB PKWY STE 200  
PO BOX 542090  
OMAHA NE 68154-8090

MR JAMES ZAMMAR  
DIR OF REVENUE ACCOUNTING  
ATA SUITE 1100  
1301 PENN AVE NW  
WASHINGTON DC 20004

MR J D MEALOR  
AIRLINE DATA COORDINATOR  
INNOVATA LLC  
3915 OLD MUNDY MILL RD  
OAKWOOD GA 30566-3410

MR ROBERT JOHNSON  
POI FOR WESTWARD AIRWAYS  
FAA FSDO LNK  
3431 AVIATION RD  
SUITE 120  
LINCOLN NE 68524-1879

AM ASSOC OF AIRPORT EXEC  
601 MADISON ST SUITE 400  
ALEXANDRIA VA 22314-1756

MR RICHARD DUTTON AFS-900  
ASST MANAGER CSET  
FAA SUITE 203B  
45005 AVIATION DRIVE  
DULLES VA 20166-7537

MR PETER LYNCH AGC-300  
ASST CHIEF COUNSEL FOR  
ENFORCEMENT  
FEDERAL AVIATION ADMIN  
800 INDEPENDENCE AVE SW  
WASHINGTON DC 20591

MGR FLIGHT STANDARDS DIV  
FAA ACE 200  
CENTRAL REGION HDQ  
901 LOCUST  
KANSAS CITY MO 64106-2641